

# **EXHIBIT 4**



LAW FIRM OF  
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ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT  
US COURT ON INTERNATIONAL TRADE

October 3, 2024

**VIA ELECTRONIC MAIL**

MOTLEY RICE LLC  
Robert T. Haeefe, Esq.  
*For the Plaintiff's Executive Committees*  
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Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MD 1570 (GBD) (SN)

Robert:

Thank you for your letter of October 2nd, 2024. First, we are not going to dignify many of the statements made in your letter. We agree that the allegations are serious. This is precisely why we requested the necessary information to be able to respond. While you criticize us for not providing particulars, you have refused to provide the document of the allegations, including who made them and what, if anything, this person—if they exist—actually claimed occurred. All we have is your broad and general description of false accusations based on an anonymous letter. Not only do we not know the provenance of the allegations but we do not have the document and the person making these allegations.

Rather than engaging in gamesmanship, we again request that you provide the written allegations you claim to have received, along with the identity of the person who made them. Please do not expect us to provide a full explanation when we do not even know what it is we must explain. Your approach leads us to feel that it is you, not us, who are engaging in intimidation tactics.

Furthermore, your comment about arranging a team call to ensure an accurate reflection of our position is ironic. You would not reasonably expect us to have a discussion between counsel on issues unknown to us prior to the call, especially concerning a deposition that occurred over three years ago. It is evident that you sought to use this call as an ambush tactic because you failed to provide this information ahead of time. You still fail to do so.

Please furnish us with the original allegations letter and the name of the person making them. Then we will respond. This is not only a fair approach, but our basic right to know and challenge. While we fully expect that you may do otherwise, we strongly urge you to comply with

this reasonable request. Doing so will save the valuable time and resources of both the Court and the parties involved.

Sincerely,

A handwritten signature in black ink, appearing to read 'Omar Mohammedi', with a stylized, cursive script.

Omar Mohammedi

*s/s Fredrick Goetz*

Frederick Goetz